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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

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ERIC SCHIERMEYER, Derivatively on Behalf  
of Nominal Defendant, BLOCKCHAIN GAME  
PARTNERS, INC. D/B/A GALA GAMES,  
Plaintiff,

vs.

WRIGHT W. THURSTON and TRUE NORTH  
UNITED INVESTMENTS, LLC,  
Defendants,

and  
BLOCKCHAIN GAME PARTNERS, INC.  
D/B/A BGP GAMES,  
Nominal Defendant.

**MOTION FOR LEAVE TO FILE  
OVERLENGTH REPLY IN SUPPORT  
OF MOTION FOR PRELIMINARY  
INJUNCTION ORDERING THE  
TEMPORARY APPOINTMENT OF A  
CUSTODIAN TO ACT AS PRESIDENT,  
CEO, AND SOLE DIRECTOR OF  
BLOCKCHAIN GAME PARTNERS, INC.**

Case No. 2:23-cv-00589-HCN-DAO

Judge Howard C. Nielson

Magistrate Judge Daphne A. Oberg

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<p>TRUE NORTH UNITED INVESTMENTS, LLC, Derivatively on Behalf of Nominal Defendant, BLOCKCHAIN GAME PARTNERS, INC. D/B/A GALA GAMES, Counterclaimant, vs. ERIC SCHIERMEYER, Counterdefendant,</p> <p>and BLOCKCHAIN GAME PARTNERS, INC. D/B/A BGP GAMES, Nominal Counterdefendant.</p>	
<p>TRUE NORTH UNITED INVESTMENTS, LLC, Crossclaim Plaintiff, vs. BLOCKCHAIN GAME PARTNERS, INC. D/B/A BGP GAMES, Crossclaim Defendant.</p>	

Defendant, Counterclaimant, and Crossclaim Plaintiff, True North United Investments, LLC (“True North”), by and through undersigned counsel, hereby respectfully moves the Court for leave to file an overlength Reply in Support of its Motion for Preliminary Injunction Ordering the Temporary Appointment of a Custodian to Act as President, CEO, and Sole Director of Blockchain Game Partners, Inc. (the “Reply Motion”) consisting of approximately 12 substantive pages.

### **ARGUMENT**

DUCivR 7-1(4)(A)(ii) authorizes reply briefs not to “exceed 10 pages”, however, allows the Court to approve an “Overlength Motion, Response, or Reply” upon a showing of “good cause why additional pages are needed”. Good cause exists here.

True North seeks leave to file its Reply Motion consisting of approximately 12 pages. The excess pages are necessary to adequately reply to the arguments asserted in Plaintiff's Opposition to True North's Motion for Preliminary Injunction Ordering the Temporary Appointment of a Custodian to Act as President, CEO, and Sole Director of Blockchain Game Partners, Inc., which contests each of the claims brought by True North on multiple grounds. True North has worked diligently to be as concise as possible but believes in good faith that to maximize the efficiency of these proceedings and conserve the resources of the Court, the overlength opposition is required to properly address the numerous arguments raised.

DATED February 16, 2024

GREENBERG TRAURIG LLP

/s/Marc Rasich

Marc Rasich

John Huber

Daniel Wadley

Alexander Baker

COOLEY LLP

Michael G. Rhodes

*Counsel for Defendants, Counterclaimant, and  
Crossclaim Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2024, a true and correct copy of the foregoing was filed with the Court's electronic filing system and thereby served on counsel of record.

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